

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

WINFORD DALLAS JONES,)	
)	
Plaintiff,)	
)	
v.)	
)	
C.H. ROBINSON WORLDWIDE, INC.,)	
)	
Defendant/Third Party Plaintiff.)	
)	
v.)	
)	Civil Action No. 7:06-CV-00547
AKJ ENTERPRISES, INC., d/b/a)	
Unlimited Express)	
)	
And)	
)	
ELSON BOLAR,)	
)	
And)	
)	
DONNIE BOLAR,)	
)	
Third Party Defendants.)	

ROBINSON'S EXHIBIT AND WITNESS LISTS

COMES NOW defendant C.H. Robinson Worldwide, Inc. ("Robinson"),
by counsel, pursuant to this Court's Scheduling Order, and Fed. R. Civ. Pro.
26(a)(3), and hereby presents its list of trial exhibits and witnesses.

TRIAL EXHIBITS

Robinson states that it expects to use the following exhibits in its case-in-chief at trial:

1. Contract Carrier Agreement between Robinson and AKJ Enterprises, Inc.;
2. Curriculum Vitae of Annette M. Sandberg, Esq.;
3. SafeStat Warning Page off of FMCSA website;
4. Printout from FMCSA website showing that AKJ Enterprises, Inc. had valid insurance during the relevant time period;
5. Carrier Survey filled out by AKJ Enterprises, Inc., in 2001;
6. Certificate of Operating Authority for AKJ Enterprises, Inc.;
7. Load confirmation sheet for load #21422065;
8. Agenda and business cards from meeting between Robinson personnel and FMCSA representatives in 2006;
8. Plaintiff's responses to Robinson's interrogatories and Requests for Admissions;
9. Case History Report and Final Order from *Canal Ins. Co. v AKJ Enterprises, et al.*, Civil Action 7:05cv00312-gec;
10. Plaintiff's pleadings;
11. Any exhibits identified by Plaintiff and not specifically objected to by Robinson;

Robinson also states that it may offer the following exhibits if the need arises:

12. Memorandum of Understanding between Coleman Cable and Robinson, dated September 30, 1997;

TRIAL WITNESSES

Robinson states that it expects to call the following witnesses in its case-in-chief at trial:

1. Annette M. Sandberg, Esq.;
2. Mark Walker;
3. Bruce Johnson;
4. Plaintiff, as if on cross-examination;
5. Any expert or fact witnesses identified by Plaintiff and not objected to by Robinson;

Robinson states that it may call the following witnesses if the need arises:

6. Max Cortis;
7. Mike Atkinson;
8. Keith Obiala;

Robinson reserves the right to amend these lists at any time up through trial, if necessary, based upon the Court's pretrial rulings, and any last-minute changes made the Plaintiff. In addition, Robinson does not intend to present any witnesses by deposition in its case in chief; however Robinson expressly reserves the right to counter-designate deposition testimony of any witnesses that Plaintiff designates.

Respectfully submitted,

C.H. ROBINSON WORLDWIDE, INC.,

By counsel,

/s://Robert Michael Doherty, Esq.

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Counsel for the Robinson Defendants

CERTIFICATE

I hereby certify that I electronically filed the foregoing with John F. Corcoran, Clerk, U. S. District Court, using the CM/ECF system which will send notification of such filing to the following on this **21st** day of **April, 2008**:

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/s:// Robert Michael Doherty, Esq.

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